EXHIBIT 1

From: Ackerman, David <dackerman@motleyrice.com>

Cc: Paul Farrell; Anthony J. Majestro; Kearse, Anne; Singer, Linda; 2804 Discovery, MDL

Subject: CT2 Trial - Week 6 Witnesses

[EXTERNAL]

EXTERNAL E-MAIL - From dackerman@motleyrice.com

Plaintiffs intend to call the following witnesses next week in the following order:

* Any witnesses from this week's list who are not called

Daniel Ciccarone

Judith Feinberg

Nancy Young

Kevin Yingling

Caleb Alexander

Thomas McGuire

George Barrett

Skip Holbrook

Steve Williams

Plaintiffs have reduced our witness list and believe these are the remaining witnesses necessary to present our case. We have made substantial cuts to get to this list.

There approximately 48 trial hours through next Friday under the current schedule. We expect our remaining direct examinations to take between 24 to 28 hours. We do not know how long you plan to cross these witnesses.

We intend to request that the Court give us enough time to finish these witnesses – even if that requires additional trial days after next Friday. We also to request full days of testimony on the remaining two Fridays. This will increase the chance that we finish by June 18, 2021, but because we do not know how long you plan for cross examinations, we cannot commit to finish by then.

Please advise whether Defendants agree to this request or wish to discuss it further.

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